

176853

Patricia Banks Morrison
Senior Counsel

tmorrison@scana.com



LETTER
#21-19-06 10:30

November 22, 2005

RECEIVED
2005 NOV 22 PM 4:39
SC PUBLIC SERVICE
COMMISSION

Hand Delivered

The Honorable Charles L.A. Terreni
Chief Clerk & Administrator
Public Service Commission of South Carolina
ATTN: Docketing Department
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Request for Investigation to Determine Whether a Regulation Should be
Promulgated Requiring Relocation of Certain Meter Sets or Installation of Splash
Guards on these Meter Sets
Docket No. 2005-270-G

Dear Mr. Terreni:

I enclose herewith for filing the original and ten copies of the Petition to Intervene of South Carolina Electric and Gas Company in this matter. SCE&G further requests it be allocated approximately 30 minutes for its testimony and presentation of evidence at the hearing on this matter.

Please stamp the extra copy of this Petition and return it with our courier. Should anything further be needed, please do not hesitate to contact me.

With kind regards,

Patricia Banks Morrison

PBM/kms
Enclosure

cc: Shannon Bowyer Hudson, Esq.
James H. Jeffries IV, Esq.
Kerry McTigue, Esq.
Jan M. Ayer

OK P. Duke
OK P. Duke

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-270-G

RECEIVED
2005 NOV 22 PM 4:39
SC PUBLIC SERVICE
COMMISSION

IN RE:

Request for Investigation to Determine Whether)
a Regulation Should be Promulgated Requiring)
Relocation of Certain Meter Sets or Installation)
of Splash Guards on These Meter Sets)
_____)

PETITION TO INTERVENE

South Carolina Electric & Gas Company ("SCE&G") hereby petitions to intervene in the above-captioned Docket under Public Service Commission Regulation 103-836 and other applicable provisions of the Commission's Rules of Practice and Procedure. In support of this petition, SCE&G would respectfully show as follows:

1. SCE&G is a corporation organized and existing under the laws of the State of South Carolina and is a public utility subject to the regulatory authority of the Commission pursuant to Title 58 of the Code of Laws of South Carolina. The address for SCE&G's headquarters is 1426 Main Street, Columbia, SC 29201.

2. SCE&G's representative in this proceeding is as follows:

Patricia Banks Morrison
South Carolina Electric & Gas Company
1426 Main Street, MC 130
Columbia, SC 29201
Telephone: 803-217-7880
Fax: 803-217-7931

3. On September 20, 2005, the Public Service Commission of South Carolina issued a directive instructing its Staff to schedule a public hearing to address issues concerning the safety of certain types of gas meters that are widely used in South Carolina.


4. As a local gas distribution company utilizing some of the meter set configurations in question, SCE&G has a direct and immediate interest in the issues to be addressed and resolved by the Commission in this docket.

5. SCE&G has not developed a position in this matter, but reserves the right to modify, amend or expand its position during the course of this proceeding.

6. SCE&G is informed and believes that granting its request is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing SCE&G's views and concerns can be developed.

WHEREFORE, SCE&G prays for the following relief:

- (a) That this Petition to Intervene be accepted by the Commission and that SCE&G be made a formal party of record to the proceeding;
- (b) That SCE&G be allowed to participate in this proceeding and to take such positions as it deems advisable;
- (c) That SCE&G be provided copies of all filings, pleadings, testimony, and exhibits in this proceeding; and
- (d) That such other and further relief be granted as is deemed just and proper.


Patricia Banks Morrison
South Carolina Electric & Gas Company
1426 Main Street, MC 130
Columbia, South Carolina 29201
(803) 217-7880
tmorrison@scana.com

November 22, 2005

CERTIFICATE OF SERVICE VIA MAIL

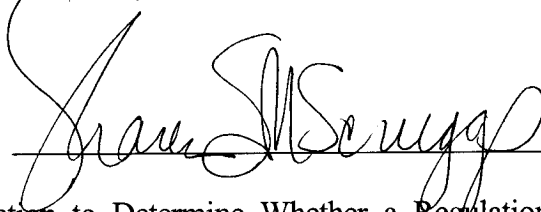
I hereby certify that on November 22, 2005, a copy of South Carolina Electric & Gas Company's Petition to Intervene was served on the parties listed below at the addresses indicated by depositing a true copy thereof in the United States Mail at Columbia, South Carolina, in an envelope with adequate first-class postage duly affixed and a return address clearly indicated thereon and addressed to:

Shannon Bowyer Hudson
Office of Regulatory Staff
1441 Main Street
Suite 300
Columbia, SC 29201

Jan M. Ayer
1140 Ridgecrest Avenue
North Augusta, SC 29841

James H. Jeffries IV
Moore & Van Allen
Bank of America Corporate Center
100 North Tryon Street, Suite 4700
Charlotte, NC 29202-4003

Kerry McTigue
Nelson Mullins Riley & Scarborough
1320 Main Street, Suite 1700
Columbia, SC 29201



Re: Request for Investigation to Determine Whether a Regulation Should be Promulgated
Requiring Relocation of Certain Meter Sets or Installation of Splash Guards on these Meter
Sets
Docket No. 2005-270-G

RECEIVED
2005 NOV 22 PM 4:40
SC PUBLIC SERVICE
COMMISSION